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8 Las Vegas Metropolitan Police
Department and Sheriff Joseph Lombardo
Lt. Michael Lusch

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA, SOUTHERN DIVISION

11 GUSTAVO RAMOS,
12 Plaintiff,
13 vs.
14 CLARK COUNTY DETENTION CENTER,
15 (an operating agency of Clark County NV),
16 NAPHCARE, INC. (a foreign corporation),
17 UNKNOWN MEDICAL SERVICES
18 PROVIDER (CORP ROE #1), WARDEN OF
19 CCDC (JOHN DOE #1), in his individual and
20 professional capacity, SHERIFF JOSEPH
21 LOMBARDO, LAS VEGAS
22 METROPOLITAN POLICE DEPARTMENT,
23 in his individual and professional capacity,
24 YOLANDA KING, in her individual and
professional capacity, (Clark County
Manager), JEFF WELLS, in his individual and
professional capacity (Asst. Clark County
Manager), LT. MICHAEL LUSCH, (Lusch or
Lt. Lusch) in his individual and professional
capacity as a supervisor at CCDC, DOES 1-X,
ROES 1-X, et al.
Defendants.

CASE NO. 2:19-cv-0124-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE TO FILE
DISPOSITIVE MOTIONS**

FIRST REQUEST

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**STIPULATION AND ORDER TO EXTEND THE
DEADLINE TO FILE DISPOSITIVE MOTIONS**

Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline to file dispositive motions in the above-captioned case sixty-two (62) days, up to and including Monday, September 13, 2021.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

9 Counsel has been practicing social distancing and working remotely. Due to these
10 unexpected and rapidly changing circumstances related to disruptions caused by COVID-19
11 related business closures, an extension of the dispositive motion deadline is necessary.

12 WHEREFORE, the parties respectfully request that this Court extend the time for the
13 parties to file their dispositive motions by sixty-two (62) days from the current deadline of July 13,
14 2021 up to and including September 13, 2021.

Dated this 22nd day of June, 2021.

16 LEWIS BRISBOIS BISGAARD & SMITH LLP

Dated this 22nd day of June, 2021.

THE MARKOWITZ LAW FIRM

17 */s/ Robert W. Freeman*
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/s/ Warren Ross Markowitz
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Attorney for Plaintiff
Gustavo Ramos

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1 Dated this 22nd day of June, 2021.

2 OLSON, CANNON, GORMLEY & STOBERSKI

3 */s/ Stephanie A. Barker*
4 Stephanie A. Barker
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7 Las Vegas, Nevada 89129
8 *Attorneys for Defendants*
9 *Yolanda King and Jeff Wells*

Dated this 22nd day of June, 2021.

SCHUERING ZIMMERMAN & DOYLE, LLP

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10 Attorneys for Defendant
11 NAPHCARE, INC.

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13 **ORDER**

14 IT IS SO ORDERED.

15 Dated this 23rd day of June, 2021.

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18 UNITED STATES MAGISTRATE JUDGE

19 The Joint Pretrial Order must be filed on or before October 13, 2021.

20 If dispositive motions are filed, the deadline
21 for filing the joint pretrial order will be suspended until 30 days after
decision on the dispositive motions or further court order.